

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

Regina Williams 816529)
(full name) (Register No.))

19-6018-CV-SJ-GAF-p

Case No.

Plaintiff(s).

v.

CORIZON

TOM Bredemann D.O. Ass. Reg. Medical Director

Stormy Moeller R.N. division Defendants are sued in their (check one):
(Full name) Penny Meehan R.N. director Individual Capacity

Karen Epperson M.D. CCC Doctor

Valicia Kirby-Nursepractitioner Official Capacity

Defendant(s). CCC Both

COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): Chillicothe Correctional Center 3151 Linton Chillicothe, MO 64601

II. Parties to this civil action:

Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff Regina Williams Register No. 816529
Address Chillicothe Correctional Center
3151 Linton Chillicothe, MO 64601

B. Defendant All Defendants are employed by
CORIZON
Is employed as
Paper Behind (next page)

For additional plaintiffs or defendants, provide above information in same format on a separate page.

Thomas K Bredeman D.O Ass. Regional
Medical Director
for CORIZON

Stormy Moeller R.N. division
Jenny Meehan R.N. Director over Chillicothe
correctional center
FOR CORIZON

Karen Epperson M.D. Chronic care provider
Atchillcothe Correctional
Center medical

Valicia Kirby - Nurse Practitioner for Chillicothe
correctional center employed
by CORIZON

- III. Do your claims involve medical treatment? Yes No _____
- IV. Do you request a jury trial? Yes _____ No
- V. Do you request money damages? Yes No _____
State the amount claimed?
~~\$1500,000.00~~ ~~500,000.00~~
~~\$1500,000.00 (actual/punitive)~~

VI. Are the wrongs alleged in your complaint continuing to occur? Yes No _____

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

Yes No _____

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes No _____

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

CCC-18-420 5.20.18 IRR WAS Started 9.20.2018 Ended CORIZON Said
CCC-18-391 5.14.18 IRR. Was started 7.23.2018 Ended CORIZON Not supported
inadequate medical care - Retaliation Not support

D. If you have not filed a grievance, state the reasons.

HAVE file D NUMEROUS gRIEVANCES THAT ARE NOT
yet done But Due to the Ominous Danger of my
spinal nerves from the untreated Disease I HAVE IM in so
much pain And can't function in the wheelchair my
WALKING again

VIII. Previous civil actions: Diagnosis if untreated could lead to me never

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes _____ No

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes _____ No

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: NA

(Plaintiff)

(Defendant)

(2) Date filed: _____

(3) Court where filed: N/A

(4) Case Number and citation: N/A

(5) Basic claim made: N/A

(6) Date of disposition: N/A

(7) Disposition: N/A

(Pending) (on appeal) (resolved)

(8) If resolved, state whether for: N/A

(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

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- B. State briefly your legal theory or cite appropriate authority:

next page

General Review

7.5.2017 to present I HAVE BEEN IN pain, Debilitating pain from my LOWER Back affecting my SPINE Affecting my SCiATIC NERVE. IT has progressed to the point of being in a wheel chair unable to preform basic human needs without pain and assistance. Walking and Standing ^{multilevel neuro} has become unbearable. My diagnosis is ~~lumbar~~ Spondinal Stenosis, Annular Bulging Disc ^{2mm 3mm} _{cervical} Radiculopathy / Neuropathy. All in my LUMBAR spine along with my Sacral and coxas undetermined Because CORiZON WILL NOT authorize any further tests or treatments. I HAVE BEEN sitting IN A Wheelchair since 10.19.17 unable to walk like a NORMAL human Being. My quality of life has diminished to the point of Mental suffering. I HAVE gained 40 lbs to date from depression and ungodly amounts of Steriods along with now I AM back on mental Health medication and seeing a psychiatrist. The pain with every mechanical movement of my lower spine (legs, arm, feet head, neck) all shoot to your lower spine. leaves Constant pain with every movement. The nerve pain is controlled with medication. The entire reason for this Civil Suit is that I AM Being Sat in A Wheel Chair AND Being refused access to A qualified Specialist ~~imbase~~ in My Case a neurology consultation.

A provider at CCC NP LA Blance has requested X RAY, CT SCAN, MRI, and 2 different times A neurology visit. All of these HAVE BEEN DENIED BY CORIZON / T Bredeman, S Moeller. The last denial of treatment was 4-16-18. That was to see A Neurologist. Since this date I HAVE RECEIVED NO medical treatment except medication AND a wheel chair. I want to walk I could walk and not be going thru any of this if CORIZON would just let me see A Specialist. I HAVE BEEN incarcerated here at DOC 13 years IAM GOING HOME IN 15 MONTHS I NEED TO BE WORRIED about adjusting to society not being robbed of a normal life. I should NOT HAVE TO BE CONFINED TO A WHEEL CHAIR this is CRUEL and UNUSUAL PUNISHMENT. Every foot step, every movement your lower body backs makes causes a electric shock of pain with every day life, A shower standing in one place is the most excruciating thing I go thru daily A shower. This has significantly changed my whole quality of life along with the serious cumulative effect from these repeated denials of care the mental depression weight gain the pain and hopelessness. CORIZON'S Rigid list of reason why they wont help me "NO CORD COMPRESSION" That MRI was done 4/3/21/18 Since then nothing

Almost ONE year later Repeated acts have accrued numerous requests for help from sick calls from IRR's from phone calls from family to family calling CORIZON All to NO Avail. I NOW HAVE NO feeling in my feet legs when I TRY to WALK I fall I Am in SO Much pain I AM Mental and physically worn out. I DO NOT Deserve this NO human Being does. This is why I AM Requesting A injunction to force CORIZON to send me to A neurologist. The imminent danger of paralisis is looming over me. The excessive Risk of my health AND safety by falling and by disabling ^{Pa} I deserve to have a regular prison life. CORIZON

T Bredeman S moeller K Epperson
Jenny Melhan Valicia Kirby All Meant to deny me necessary medical care. I have a right to walk depriving me of seeing a neurologist to investigate the "cause" of my condition causing my serious pain; paralisis. is deliberate indifference to my serious needs
STATEMENTS OF FACTS

7-5-17 Sick call Back pain

7-18-17 Saw DR. SchAAF prescribed predizON pack

7-26-17 Sick call (PAIN) NEVER Received prescribed prediza

8-28-17 Sick call

9-05-17 Sick call

9-22-17 Sick call

9-27-17 provider NP T LaBlance Steriod shot

X RAY Scan

10.2.2017 X-Ray Done

Provider

10.19.2017 X Ray Discussed by La Blance/Radiologist
(DEF #1) Requested Cat Scan for further testing

CORIZON Denied

Cat Scan 10.19.2017

(Def#3) S Moeller Denied Cat Scan Requested by
on site provider also Requested by Radiologist
that read x-Rays.

11.2.17

Back pain crying for
steroids

11.6.17

help given shots of steroids

11.9.17

flexril mom has called.

11.20.17

flexril mom has called.

11.27.17

Urinating on myself

12.15.17

12.18.17 Seen DR. Rhodes she put in a request for
me to be evaluated by chronic care pain

Def #4 12.21.17 Pealed me for chronic care even
though I am already chronic care for
tachycardia for my heart. Which pain
directly affects your pulse. Denied any
tests

1.4.2018 Mother calls I'm in pain

Def #5 1.19.2018 Nurse Practitioner Kirby tells me basically
I'm lazy and fat and nothing is
wrong with me says I'm exaggerating
my walk to work past the pain says
my back issue is resolved

Def #5 1.24.2018 I was back in self declare in so much
pain and nerve pain that I couldn't
stand it. NP KIRBY is Rude Hateful and
Condescending in her reports she lies
and falsify's her finding States things
like grimacing before touching States
Sister had written it going to jail lies

I have not been able to do any mechanical movements without grimacing in month. Refused further xRays, Diagnostics says nothing is wrong with me.

1.31.18 Sick call Back pain

2.2.18 provider Another predi zone pack

2.13.18 Back pain Sick call Kirby intervenes

3.07.18 provider LaBlance due to vaginal Rectal numbing MRI (Lumbar only) ^{no} ^{sacral (OR coccy} XRAY Repeated

3.8.18 Sick call

3.13.18 Self Declared Kirby comes in telling me I'm faking I'm over reacting I not in as much pain as I'm saying. Does Nothing tells me to lose weight

3.18.18 Sick call Back pain evaluated Vital

3.19.18 mother called ^{Intervened again lying on her} notes taking away the seriousness

3.23.18 Neurology Consultation Requested

By provider np LaBlance due to ^{abnormal} negative findings on lumbar spine MRI. Wheel chair. Ultram

3.23.18

Denied Neurology consultation even though I'm in emence pain sent to physical therapy

4.4.18 Mother Called

4.5.18 Sick call pain urinating on myself

4.14.18 SELF Declare gut wrenching pain the Siactic nerve is pounding.

4.24.18 Sick call Back Pain so Bad Vital's is distress so much pain

4.16.18 ^{Re Submitted} Re Sub Missed of Neurologist

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DEF 1 4.16.2018

DEF2 Denied Neurology per medical Director
CORIZON The medical necessity for neurology is
TBredemann not met. Chronic lumbago with sciatica.

NO current neuromuscular examination
indicating progressive or worsening
myelopathy. Inmate DID NOT tolerate
physical therapy OR participate in pt
MRI reveals PJD/ Formaminal stenosis
no cord compression. Recommend
treating Inmate pain OBJECTIVELY
rather than Subjectively wit
Appropriate non-narcotic medication
And once pain is controlled re-
initiating pt.

4.12.18 I did try to Do physical therapy I
Was feet shackled and arm shackled
AND Driven to the hospital plus coughing
A squatting 3 times I can Barely
move But was made to do this
Before I got to the hospital.

I Did what I could the person
doing it stopped it Because of my
Vitals And nausea She Reports
that She Recommends specialists
also. 75% disabled.

AFTER this transport AND put in A car
instead of A wheel Chair ace. van. The strip
Search the shaking the physical therapy
The nerves are impinged from the swelling
on my spine I'm peeing on myself I
Cant feel my legs these nerve pain the constant
gut wrenching pain I never attempt help.

Insert
May
15
▼

4.24.18 Sick call Back pain NO ONE will help me.
5.2.18 I'm seeing a provider LA Blance But she tells me there is nothing else corizon wont allow anything tells me she has been instructed to deal with me objectively not subjectively I asked what that meant. She said it meant to take away the person deal with the problem. La Blance DID give me ultram for the pain it does not help the nerve (Sciatica) the pulsing pounding But it does help the mechanical movement pains. Vitals off the chain

Def(1)
Def(2)

5.18.18 T Bredeleman Retaliated for filing IRR took away ultram (Pain medication) saying because I was on Gabapentin they are for 2 different things ONE The Gabapentin is for a nerve blocker. The ultram was for the pain in movements. I didn't take the ultram all the time only when I really needed it.

5.15.18 told that Gabapentin would be raised to 400mg.

5.16.18 filed A IRR ON Denying all my test And Neurologist.

5.17.18 Called by Mrs. Corbin she told me. She talked to T. Bredeleman he said NO Neurologist.

5.18.18 Retaliated And discontinued My tramadol States T Bredeleman Tramadol must be discontinued if Gabapentin is started. I have been on Both since 4.14.18 App. By T Bredeleman

apentin And tramadol is contraindicated because of the potential for abuse, And reinforcement of drug seeking behavior. please note. he App. Both Since 4-14-18 Also I used it only when necessary.

5-20-18 Self Declare pain so bad

5-21-18 physical therapy in TCU had to refuse I had A Biopsy on my uterus today plus no pain medication can't do physical therapy

unfortunately I have been waiting for my medical Records Since 1-10-18 from 5-21-18 to present I paid for them but have not received them. I Am in so much pain I can't think straight anymore I have got to get this filed to see A neurosurgeon I'm hoping I am doing this right on the imminent danger to see a specialist.

My legal theory

The U.S. Constitution requires prison officials to provide all state prisoners adequate medical care. *Estelle v. Gamble*, 429 U.S. 97, 103, 975 Ct. 285, 290, 50 L. Ed. 2d. 251 (1976). (42 U.S.C § 1983) is proper venue while requesting relief. CORIZON is Missouri Department of Corrections Health Care provider. CORIZON is defendant #1 in the official capacity. Tom Bredeman is the Regional Medical Director and is defendant #2 and is being named in the "official" and "individual" capacity. S Moeller is a RN employed by CORIZON is being named as defendant #3 in the "official" and the "individual" capacity. DR. Epperson is the Chronic Care Doctor at Chillicothe Correction Center and is being named in the "official" capacity and the "individual" capacity. ALSO employed by CORIZON Valicia Kirby Nurse practitioner is being named in the "official" and "individual" capacity in violating my civil rights. The cumulative effects of these 5 defendants in the name of CORIZON & HAVE intentionally delayed medical treatment since 7-5-17 to present. My Eighth Amendment Right to be free from cruel and unusual punishment and the unnecessary and wanton infliction of pain. Applying the Deliberate indifference Standard failing to investigate enough to make a informed judgement *Tillery v. Owens*.

719 F. Supp. 1256 1308 (W.D. Pa 1989) aff'd, 907 F.2d. 418 (3rd Cir 1990) CORIZON AS TO DATE HAS ALLOWED ME TO SUFFER IN PAIN SITTING ME IN A WHEELCHAIR GAINING 60 LBS MENTAL DEPRESSION DEGENERATING MY ~~BACK~~ BACK AT A FASTER RATE WITH LITTLE MOVEMENT. CORIZON DEFENDANT 1 THRU 5 DID NOT PROPERLY TREAT ME, DID NOT INVESTIGATE THE CAUSE OF MY MEDICAL CONDITION, LISCIO V. WARREN 901 F. 2d 274, 276-77 (CIR 1990) DID NOT ORDER DIAGNOSTIC TESTS. (TRIED TO ORDER SOME BUT WAS DENIED) PEREZ V. ANDERSON, 350 F. APP'X 959, 961 (5TH CIR. 2009.) DID NOT SEND ME TO A SPECIALIST (WAS ATTEMPTED BY DEFENDANTS 1, 2, 3 ^{1ST} DENIED) GREENO V. DALEY 414 F. 3d 645, 655 (7TH CIR 2005) ALSO THE INTENTIONAL DELAY TYLER V. SMITH 458 F. APP'X 597, 598 (9TH CIR 2011) ALSO SEE McELIGOTT V. FOREY 182 F. 3d 1248 1256-57 (11TH CIR 1999) FINDINGS THAT REPEATED DELAYS CONSTANT PAIN LACK OF DIAGNOSTIC TESTS MURPHY V. WALKER 51 F. 3d 714 719 (7TH CIR 1995) IN THE STATEMENTS OF FACTS CORIZON AND THE ~~OTHER~~ DEFENDANTS WERE VERY MUCH AWARE OF MY REPEATED ATTEMPTS TO GET MEDICAL ATTENTION TO RECEIVE PROPER AND ADEQUATE MEDICAL ATTENTION. EVEN A LAY PERSON CAN SEE MY MEDICAL NEEDS THE CHRONIC AND SUBSTANTIAL PAIN BROCK V. WRIGHT 315 F. 3d 158, 162 (2ND CIR 2003) DEFINES A SERIOUS MEDICAL NEED AS A "CONDITION OF URGENCY ONE THAT MAY PRODUCE DEATH, DEGENERATION OR EXTREME PAIN. ALL OF 5 DEFENDANTS IGNORED MY OBVIOUS DIAGNOSED CONDITION AND LEFT ME IN CONTINUAL TORMAIL SHEPHERD V. POWERS NO 11 CIV. 6860 (LTD 6/18/11) 202 N.Y. 4177441 H # 6/16/11 NY 5/27/2012)

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Hudson v. McHugh, Sanderfer v. Nichols,
Reeves v. Collins all show that Delaying
interfering with medical orders that
a provider requested, The physical
therapist At Cameron Hospital The
Radiologist Reading the x rays. All Were
denied by Defendant 1# 2# 3# Gil
V Reed, 535 F.3d 551. 557 (7th Cir 2008)
Now Almost 1 year from the last X RAY
OR mRI Nothing has been done on Any
treatment except for my home exercise
plan that ^{I do} Cameron gave me almost 1 year
ago. I walk at the most 3-4 min. I
can not stand in one place more than
5min. my feet are numb legs numb I
fell due to legs not working urinating
on 12.20.18 I was refused Any
new tests say not needed Refused Neurology
Defendant #4 says NO further treatment
needed. I am in constant pain and I am
afraid of the damage that ^{these} nerves
could be hurt for life. I Am in imminent
danger of serious physical harm.
I am requesting the courts for a
junction requesting a neurology consult
and any tests and procedures requested
Brown v. Johnson, 387 F.3d 1344, 1350 (11th Cir 2004)
Jenny Meehan DEF #3 in the official
Capacity and in the individual
Capacity in the employment of
Cameron is a RN But also is and has
the position ~~to see~~ of Grievances
She is in the Supervisory role

Medical department thru corizon. When Def#3 See's inconsistanty in medical Charting and care it is her Duty of Care to Me to address the situation and not to turn her head. I Grievance Response ccc 18-842 The information was provided to her and she wrote it down but did nothing continually allowing my medical needs to go unresolved also seeing that provider DR. Epperson ~~was~~ on 12-27-18 completely lied on my medical records stating I was observed in no obvious distress no disability noted (Im in a wheelchair) I walked sat and stood normal. All is completely lies condoneing these lies allows my medical needs to be continually denied. allowing me to have a cumulative affect of serious pain non stop since 7-15-17 until present my quality of life has diminished to the point of hopelessness. mental suffering Im so afraid of perment spinal injury that's what happens when you put it in the internet it says if untreated perment injury. I do not deserve to be put in a wheelchair and go untreated. let me reiterate due to my persistence they see me but they due nothing to resolve this condition not allowing me to see a specialist and have charting showing a progressive

Disease especially on my spine that
is essential to the bodies entire
movement Bgnillies

- X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.
Injunction to let me see neurologist Cat Scan of my entire spine. Compensation for the pain and suffering and Money spent.
XI. Counsel: Actual / Punitive Damages

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. NA

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes No

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted. (Enclosed letter)

Thomas R Bellman 311 W. Kansas Independance mo
Hiedman 111 W. Broadway Bolivar mo
John E Kurtz 814 241 2287 64050

C. Have you previously had a lawyer representing you in a civil action in this court?
Yes No

If your answer is "Yes," state the name and address of the lawyer.
NA

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this 30 day of January 2019.

Bjorn Willis 846529
Signature(s) of Plaintiff(s)

Receiving Acknowledgment 8:05PM TA

cc:

3151 Miller

Chillicothe Mo letter

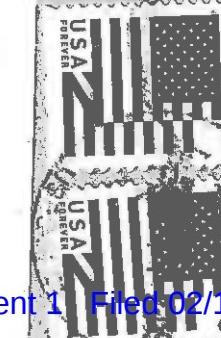
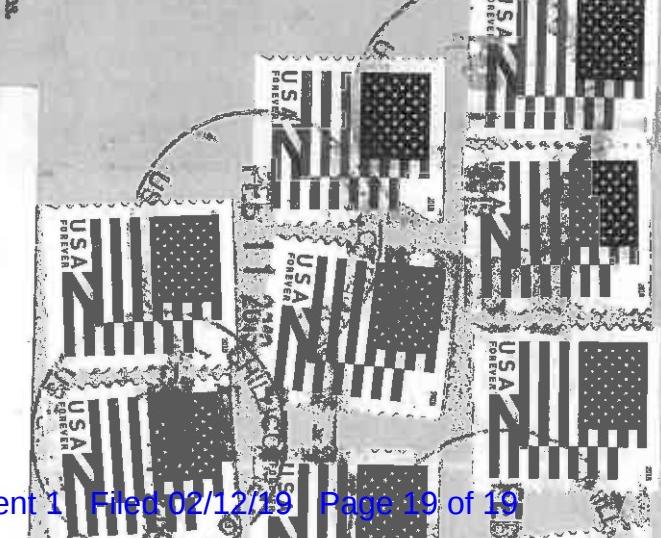
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U.S. District Court

Office of the Clerk

1510 Whittaker Court House

400 e. Main Street

Kent 64106

EXPECTED DELIVERY DAY: 02/12/19

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